

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

THIS DOCUMENT RELATES TO:

*Gaston Roberts et al. v. Zhejiang
Huahai Pharmaceutical Co., et al.,*

Case No. 1:20-cv-00946-RBK-JS

MDL No. 2875

Honorable Renée Marie Bumb
District Court Judge

**DECLARATION OF NINA ROSE IN SUPPORT OF DEFENDANTS' MOTION
TO EXCLUDE THE OPINIONS OF DR. WILLIAM R. SAWYER, PH.D.**

I, Nina Rose, declare as follows:

I am an attorney and a partner with the law firm Kirkland & Ellis LLP, counsel for Defendants Zhejiang Huahai Pharmaceutical Co., Ltd., Solco Healthcare U.S., LLC, and Princeton Pharmaceutical Inc. ("Defendants") in the above-captioned matter. The facts stated in this Declaration are true of my own personal knowledge. I submit this Declaration in Support of Defendants' Memorandum of Law in Support of Motion to Exclude the Opinions of Dr. William R. Sawyer, Ph.D.

1. Attached hereto as **Exhibit 1** is a true and correct copy of Expert Report of Dr. William R. Sawyer, Ph.D., dated March 10, 2025. ("Sawyer Rep.")
2. Attached hereto as **Exhibit 2** is a true and correct copy of Pottegård, Anton, et al. "Use of N-nitrosodimethylamine (NDMA) contaminated valsartan

- products and risk of cancer: Danish nationwide cohort study." *bmj* 362 (2018). ("Pottgard 2018")
3. Attached hereto as **Exhibit 3** is a true and correct copy of Gomm, Willy, et al. "N-Nitrosodimethylamine-contaminated Valsartan and the risk of cancer: A longitudinal cohort study based on German Health Insurance Data." *Deutsches Ärzteblatt International* 118.21 (2021): 357. ("Gomm 2021")
 4. Attached hereto as **Exhibit 4** is a true and correct copy of Mansouri, Imène, et al. "N-nitrosodimethylamine-Contaminated Valsartan and Risk of Cancer: A Nationwide Study of 1.4 Million Valsartan Users." *Journal of the American Heart Association* 11.24 (2022): e8067. ("Mansouri 2022")
 5. Attached hereto as **Exhibit 5** is a true and correct copy of Deposition Transcript of Dr. William R. Sawyer, Ph.D., dated May 2, 2025. ("Sawyer 5/2/2025 Dep.")
 6. Attached hereto as **Exhibit 6** is a true and correct copy of Deposition Transcript of Dr. William R. Sawyer, Ph.D., dated May 1, 2025. ("Sawyer 5/1/2025 Dep.")
 7. Attached hereto as **Exhibit 7** is a true and correct copy of In Re Roundup Products Liability Litigation, Case No. 16-md-02741-VC, Amended Pretrial Order No. 201, ECF No. 9142 (N.D. Cal. Jan. 21, 2020).
 8. Attached hereto as **Exhibit 8** is a true and correct copy of Hidajat, Mira, et

- al. "Lifetime exposure to rubber dusts, fumes and N-nitrosamines and cancer mortality in a cohort of British rubber workers with 49 years follow-up." *Occupational and Environmental Medicine* 76.4 (2019): 250-258. ("Hidajat 2019")
9. Attached hereto as **Exhibit 9** is a true and correct copy of Hill, Austin Bradford. "The environment and disease: association or causation?." (1965): 295-300. ("Hill 1965")
 10. Attached hereto as **Exhibit 10** is a true and correct copy of Expert Report of Dr. William R. Sawyer, Ph.D., Vosper, et al. v. Monsanto, Case No. 3:16-md-02741-VC, ECF No. 13779-2, dated June 24, 2024.
 11. Attached hereto as **Exhibit 11** is a true and correct copy of Howard, John. "Minimum latency & types or categories of cancer." *Centers for Disease Control and Prevention* (2014): 1-9.
 12. Attached hereto as **Exhibit 12** is a true and correct copy of Nadler, Diana L., and Igor G. Zurbenko. "Developing a weibull model extension to estimate cancer latency." *International Scholarly Research Notices* 2013.1 (2013): 750857. ("Nadler 2013")
 13. Attached hereto as **Exhibit 13** is a true and correct copy of Zheng, Jiali, et al. "Dietary N-Nitroso compounds and risk of hepatocellular carcinoma: a USA-based study." *Hepatology* 74.6 (2021): 3161-3173. ("Zheng 2021")

14. Attached hereto as **Exhibit 14** is a true and correct copy of Second Supplemental Expert Report of Lewis A. Chodosh, M.D., Ph.D., April 10, 2025. ("Chodosh Sec. Supp. Rep.")
15. Attached hereto as **Exhibit 15** is a true and correct copy of IARC, Carcinogenicity of Consumption of Red and Processed Meat, dated October 26, 2015.

I certify under penalty of perjury that the foregoing is true and correct.

Dated: May 22, 2025

Respectfully submitted,

/s/ Nina R. Rose

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 22, 2025, a true and correct copy of the foregoing document was served upon counsel of record via operation of the Court's electronic filing system.

Dated: May 22, 2025

Respectfully submitted,

/s/ Nina R. Rose

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